

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

DIGITAL MEDIA SOLUTIONS, LLC,	:	Case No. 1:19-CV-145
	:	
Plaintiff,	:	
v.	:	JUDGE DAN AARON POLSTER
	:	
SOUTH UNIVERSITY OF OHIO, LLC., et al.,	:	MAGISTRATE JUDGE
	:	THOMAS M. PARKER
Defendants.	:	

**STATUS REPORT OF DREAM CENTER SOUTH UNIVERSITY, LLC NOTIFYING  
THE COURT OF STATUS OF ECF NO. 239 AND ECF NO. 240**

Intervenor Dream Center South University, LLC (“South”), by and through its undersigned counsel, files this Status Report Notifying the Court of the Status of its Motion for Clarification of Payment Terms (ECF # 239) and Response to Studio Enterprise Manager’s (“Studio”) Motion for an Order Requiring the Receiver to Execute Sublease and Comply with Terms (ECF # 240) in accordance with the Court’s April 22, 2019 Order (ECF # 271).

**STATEMENT**

On April 8, 2019, South filed its *Motion for Clarification on Payment Terms* (ECF # 239) and its *Response to Studio’s Motion for an Order Requiring the Receiver to Execute Sublease and Comply with Terms* (ECF # 240). South addresses each in turn.

First, in its Status Report filed on April 18, 2019, (ECF # 267), South noted that it was withdrawing its request for relief in the *Motion for Clarification of Payment Terms* (ECF # 239) due to changes in circumstances. (See ECF 267 at PageID # 5347 n.3.) Specifically, because Studio’s Separation Plan contemplates that Studio will hire the shared IT personnel, continue to employ the compliance team, and make direct payments for other costs, payments to Dream Center Education Holdings, LLC (“DCEH”) to maintain the shared services would not be required and the risk of duplicative payments by South for these services should be eliminated,

mooting the relief sought in the Motion for Clarification. (*Id.*) South reserves the right to request from the Court any further relief necessary, including any clarification on payment terms if the Court requires or the parties agree that payments should be made to DCEH, for instance should DCEH, not Studio, continue to or resume providing the relevant services to South.

Second, on or before April 29, 2019, as ordered by the Court, South will file an amendment to its *Response of Dream Center South University, LLC to Studio's Motion for an Order Requiring the Receiver to Execute Sublease and Comply with Terms* (ECF # 240) to reflect portions of that Response that have not been mooted by recent developments.

Respectfully submitted,

COHEN & GRIGSBY, P.C.

By: /s/ Ingrid A. Bohme

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*Attorneys for Intervenor,*

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Dated: April 22, 2019

**CERTIFICATE OF SERVICE**

I hereby certify that on the 22nd day of April, 2019, the foregoing *Status Report of Dream Center South University, LLC* Notifying the Court of Status of ECF No. 239 and ECF No. 240 was filed with the Court electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system. Parties identified as not receiving electronic filing notifications will be served by U.S. First Class Mail.

/s/ Ingrid A. Bohme